

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS TIMOTHY D. ELLARD
(OCA/USPS-T6-21-24)
(July 23, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

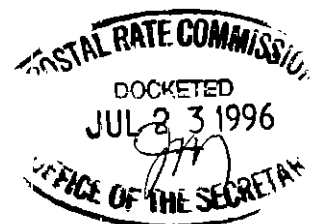
Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

Shelley Dreifuss

SHELLEY DREIFUSS
Attorney



OCA/USPS-T6-21. Please refer to your response to OCA/USPS-T6-1.

- a. In your response to part "e", you referred to the postmaster's instructions as "one possible reason that the cards should not be placed in a cluster." Please explain other possible reasons that cards should not be placed in a cluster.
- b. In your response to part "f", you stated that postmasters were not asked to return calculations of placement intervals to Opinion Research Corporation. Please explain how you could check that this aspect of sampling was performed correctly in the absence of this data.

OCA/USPS-T6-22. Please refer to your response to OCA/USPS-T6-2.

- a. Would your response to part "d" change if the reference to box holders was removed from the question? Can you confirm that post office boxes with the lowest and highest box numbers have a greatly reduced (or zero) chance of selection as compared to the rest of the boxes at this location? If you do not confirm, please explain.
- b. Please refer to your response to part "e." Could non-integral sampling intervals and a random starting box

selection have avoided the problem of excluding the first and last group of boxes from sample? Please explain.

OCA/USPS-T6-23. Please refer to your response to OCA/USPS-T6-3.

- a. In reference to part "e" of your response, please provide a citation to the portion of your testimony that describes how post-stratification compensates for potential bias. If this is accomplished in your estimation programs, please provide a reference to the section of the computer code that makes this adjustment.
- b. Please refer to your response to part "g." Suppose that the 73 box holders were randomly distributed to 73 post office boxes. If this were the case, then would the first 25 boxes provide a random sample of box holders? Please explain.

OCA/USPS-T6-24. Please refer to your response to OCA/USPS-T6-5.

- a. In your response to part "b," please confirm that the formula at the top of page 53 of SSR-111 should have D_{rhz}^* in place of D_{rh} , and that "z" should appear as a subscript for

F, on the left-hand side of the formula. If you do not confirm, please explain.

- b. In response to part "d," you state, "Cross-examination of weights was done after computation of weights. This manual process has nothing to do with the referenced formula." Please describe this "cross-examination" process and any specific changes to weighting factors that were made as a result of this process.
- c. Please refer to your response to part "e." The formula at the top of page 53 of SR-111 (when modified as suggested in your response to OCA/USPS-T6-5.b.) appears to depend on the trimmed design weight for the z -th PSU. Please explain why the final weights do not depend on the selection probabilities, P_{rz} . Please explain how post-stratification eliminates the need to use PSU sample selection probabilities to produce valid estimates.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


SHELLEY DREIFUSS
Attorney

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July 23, 1996